

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/14/2025

January 14, 2025

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Doe v. Combs, et. al.*, Case No. 24-cv-08024 (VEC)

Dear Judge Caproni:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants") and defendant Bad Boy Records, LLC.

The undersigned parties have agreed that the Combs Defendants and Bad Boy Records, LLC will accept service through the undersigned counsel of (1) the Complaint (ECF #1) and (2) the Plaintiff's Second Motion for Leave to Appear Anonymously (ECF #25, the "Second Anonymity Motion") in exchange for Plaintiff's consent to an extension of time to respond to each until **March 11, 2025**.

Consistent with this agreement, the undersigned parties respectfully request that the Court enter a scheduling order providing that (1) the Combs Defendants and Bad Boy Records, LLC shall have until **March 11, 2025** to answer, move, or otherwise respond to the Complaint; and (2) the Combs Defendants and Bad Boy Records, LLC shall have until **March 11, 2025** to file an opposition to the Second Anonymity Motion. No prior request for this relief has been made.

Respectfully submitted,

/s/ Mark Cuccaro

Mark Cuccaro
SHER TREMONTE LLP
90 Broad Street, 23rd Fl.
New York, New York 10004
T: 212.202.2600
mcuccaro@shertremonte.com
Counsel for the Combs Defendants

/s/ Antigone Curis

Antigone Curis
CURIS LAW, PLLC
52 Duane Street, 7th Fl.
New York, NY 10007
(646) 335-7220
antigone@curislaw.com
Counsel for Plaintiff John Doe

Hon. Valerie E. Caproni

January 14, 2025

Page 2 of 2

/s/ Donald S. Zakarin

Donald S. Zakarin

PRYOR CASHMAN, LLP

7 Times Square

New York, NY 10036

212-326-0108

dzakarin@pryorcashman.com

Counsel for Defendant Bad Boy

Records, LLC

Application GRANTED. Defendants' deadline to answer or otherwise respond to the Complaint is ADJOURNED to **Tuesday, March 11, 2025**. Defendants' deadline to file opposition papers to Plaintiff's Second Motion for Leave to Appear Anonymously at Dkt. 25 is also **Tuesday, March 11, 2025**. Plaintiff's deadline to file reply papers, if any, is **Tuesday, March 25, 2025**.

IT IS FURTHER ORDERED that Plaintiff must serve Defendants and file proof of service on ECF by **Tuesday, January 21, 2025**.

SO ORDERED.



1/14/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE